SAPONE & PETRILLO, LLP

Edward V. Sapone, Esq., Partner   William S. Petrillo, Esq., Partner

<u>MANHATTAN</u>   <u>LONG ISLAND</u>

40 Fulton Street, 17th Floor   1103 Stewart Avenue, Suite 200
New York, New York 10038   Garden City, New York 11530
Telephone: (212) 349-9000   Telephone: (516) 678-2800
Facsimile: (347) 408-0492   Facsimile: (516) 977-1977
E-mail: ed@saponepetrillo.com   E-mail: william@saponepetrillo.com

April 5, 2022

The Honorable Brian M. Cogan
United States District Court of the
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

> Re: *United States v. Gregory Altieri*
>   Indictment No.: 20-CR-0249 (BMC)

Dear Judge Cogan:

I am retained counsel to Defendant Gregory Altieri who is scheduled for sentencing on Thursday, April 7th at 4:45 p.m. I write to respectfully request an adjournment of sentencing to June 6th or any further date convenient to the Court.

I have been dealing with serious medical problems at home while I've been continuously working on my sentencing submission to Your Honor. Mr. Altieri and I also have continued to work on obtaining documents that I need to submit to Your Honor to support my 3553(a) arguments. This request adjournment will also give Mr. Altieri the opportunity to undergo a necessary surgery to address medical disabilities with which he has suffered. In addition, we have continued to assist the trustee in the parallel EDNY bankruptcy case. Part of the assistance we have lent refers to the actual amount of money the creditors (victims in the case before this Court) have lost so that those creditors can be made whole and when we stand before Your Honor for sentencing we will be able to represent to the Court the actual loss amount suffered by the victims which will speak to the nature and circumstances of the offense.

I have discussed this request with AUSA Lauren Elbert. The government consents to this request.

I very much appreciate Your Honor's consideration of this request.

Respectfully submitted,

/s/ Edward V. Sapone
Edward V. Sapone

cc: AUSA Lauren Elbert